## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

ST. LOUIS-KANSAS CITY CARPENTERS REGIONAL COUNCIL, et al.,	}
Plaintiffs,	) Case No. 4:19-cv-02574 AGF
v.	<u> </u>
ZOIE, LLC,	}
Defendant.	}

## STIPULATION FOR ENTRY OF CONSENT JUDGMENT

Come now the parties and stipulate as follows:

- 1. Judgment shall be entered in favor of plaintiffs St. Louis-Kansas City Carpenters Regional Council, *et al.*, and against Zoie, LLC in the amount of \$64,267.67 consisting of \$55,195.15 in contributions through August 2019, \$7,988.16 in liquidated damages and \$1,084.35 in interest.
- 2. Execution on the judgment amount set forth in paragraph 1, above, shall be stayed so long as defendants complies with paragraphs 3 and 4, below.
  - 3. Defendants shall make payments to plaintiffs pursuant to the following schedule:
    - 1) \$3,000.00 on or before November 1, 2019;
    - 2) \$3,000.00 on or before December 1, 2019;
    - 3) \$3,000.00 on or before January 1, 2020;
    - 4) \$3,000.00 on or before February 1, 2020;
    - 5) \$3,000.00 on or before March 1, 2020;
    - 6) \$10,000.00 on or before April 1, 2020;
    - 7) \$5,000.00 on or before May 1, 2020;
    - 8) \$5,000.00 on or before June 1, 2020;
    - 9) \$5,000.00 on or before July 1, 2020;
    - 10) \$5,000.00 on or before August 1, 2020;
    - 11) \$5,000.00 on or before September 1, 2020;

- 12) \$5,000.00 on or before October 1, 2020;
- 13) \$5,000.00 on or before November 1, 2020;
- 14) \$4,267.67 on or before December 1, 2020.
- 4. Defendant shall submit its reports and contributions to the Carpenters Funds on or before the date due as set forth in the collective bargaining agreement to which defendant is party for any work performed by the defendant which is covered by the Carpenters collective bargaining agreement.
- 5. If defendant fails to make a payment when due pursuant to paragraphs 2 or 3, above, plaintiffs' counsel shall provide written notice of such default to defendant's counsel, and defendant shall have five (5) business days from the date of such notice to cure any such default.

WHEREFORE, the parties stipulate to entry of a consent judgment according to the above terms.

ZOIE, LLC

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